

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: RAMON LUIS PAGAN MONTALVO, DEBTOR,	CASE NO. 08-07951 BKT CHAPTER 13
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MOTION FOR POST-CONFIRMATION
AMENDED PLAN DATED AUGUST 18TH 2009

TO THE HONORABLE COURT:

COMES NOW, the petitioner through the undersigned counsel whom respectfully STATES and PRAYS:

1. Petitioner submits amended post-confirmation amended plan dated August 18th 2009, proposing 1x of \$450.00; 59x of \$600.00 and \$4,000 lump sum for an overall sum of \$39,850.00. The collateral due secured creditor Coop A/C Arecibo (claim no. 6) and Coop A/C San Rafael are surrendered.

2. Petitioner submits this plan pursuant to Trustee's recommendation asking shares to Coop A/C Arecibo be surrendered.

WHEREFORE, petitioner prays the Court consider the herein along with any other order it deems just and proper.

CERTIFICATE OF SERVICE. The herein has been transmitted via mail and the CM/ECF system to Trustee A. Oliveras and all other parties in interest and via mail to all parties in interest not CM/ECF participants.

30-DAY NOTICE

ALL PARTIES IN INTEREST HAVE THIRTY DAYS FROM THE DATE OF THIS NOTICE TO FILE A WRITTEN OBJECTION WITH THE CLERK OF THE COURT AND FAILURE TO DO SO WILL ALLOW THE COURT TO GRANT THE REMEDY REQUESTED WITHOUT FURTHER HEARING OR NOTICE

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, this 18th day of August 2009.

/s/ WIGBERTO MERCADO, ESQ.
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**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. **08-07951**

PAGAN MONTALVO, RAMON LUIS

Chapter **13**

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: **8/18/2009**

☐ AMENDED PLAN DATED: _____

☐ PRE ☒ POST-CONFIRMATION

Filed by: ☐ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ **450.00** x **1** = \$ **450.00**
\$ **600.00** x **59** = \$ **35,400.00**
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____

TOTAL: \$ **35,850.00**

Additional Payments:

\$ **4,000.00** to be paid as a LUMP SUM
within **60 months** with proceeds to come from:

☐ Sale of Property identified as follows:

☒ Other:

ANNUAL \$900.00 EMPLOYMENT CHRISTMAS BONUS.

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ **39,850.00**

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ **2,400.00**

Signed: /s/ RAMON LUIS PAGAN MONTALVO
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. **BANCO BILBAO VIZ** Cr. _____ Cr. _____
13249609117071 # _____ # _____
\$ **9,664.00** \$ _____ \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

4. ☒ Debtor SURRENDERS COLLATERAL to Lien Holder:

COOP A/C ARECIBO COOP A/C SAN RAFAEL

5. ☐ Other:

6. ☐ Debtor otherwise maintains regular payments directly to:

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☒ Classifies ☐ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____
☐ Paid 100% / ☐ Other: _____

Cr. **COOP A/C SAN RAFAEL** Cr. _____ Cr. _____
218862081 # _____ # _____
\$ **34,200.00** \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)

1. ATTORNEY FEES TO BE PAID AFTER CONFIRMATION PRIOR TO ALL CREDITORS.

2. INSURANCE TO BE PROVIDED BY UNIVERSAL INSURANCE FOR BBVA COLLATERAL.

3. ADEQUATE PROTECTION PAYMENT OF \$100.00 MONTHLY TO BBVA FROM FILING UNTIL CONFIRMATION.

4. COOP A/C SAN RAFAEL TO BE PAID AHEAD OF ALL UNSECURED CREDITORS.

Attorney for Debtor **Wigberto Mercado Law Offices**

Phone: **(787) 840-5800**